

# Exhibit D

1 Page 1

2 IN THE UNITED STATES DISTRICT COURT

3 NORTHERN DISTRICT OF OHIO

4 EASTERN DIVISION

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7 IN RE: NATIONAL PRESCRIPTION OPIATE LITIGATION VS.

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9 Case No: 1:17-md-2804-DAP

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This document relates to:

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All cases

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AUDIO TRANSCRIPTION

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2/8/2019 Discovery Telephonic Conference

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Transcribed February 11, 2019

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1 bit of a digression and talk about the parties are  
2 working on essentially an agreement to amend the CMO,  
3 CMO1 that would extend deadlines and talk about what  
4 it is that the parties will do, which I understand  
5 includes supplementation of interrogatories,  
6 supplementation of 30(b)(6) written topics, and so on.

7 I've reviewed the last submission I got on  
8 that, which was defendants' redline to plaintiffs'  
9 proposal. And we had talked, also, about getting  
10 together Tuesday to get in a room and see if we can  
11 negotiate this out. Frankly, what I received is --  
12 it's all in code. I'm sure that plaintiffs and  
13 defendants understand what they're saying when they're  
14 saying the things they're saying in their proposal,  
15 but to the extent that I'm sure it will have to  
16 happen, that I have to settle a dispute over what any  
17 of that means, I don't know. It's literally code.

18 And so what I think we need to do is sit in a  
19 room and figure out what additional discovery will be  
20 allowed exactly, and what the deadlines for that  
21 discovery will be, and give examples and state it  
22 specifically, whether it's by agenda item number or  
23 anything else. And come to a very clear understanding  
24 of what's left and what will be allowed going forward,  
25 and deadlines for it, and that kind of thing. And as